IV. Remarks

Claims 1-15 are currently pending. No claims have been added or canceled. No claims have been amended. Reconsideration of this application in light of the following remarks is requested.

Amendments to the Drawings

Fig. 3 has been amended to amend the reference numerals to match those set forth in the specification. In particular, the reference numerals for the left line interfaces have been changed from 44 to 38 to match the description set forth in paragraphs [0059] and [0060].

Rejections under 35 USC §102

Claims 1-15 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Application Publication 2003/0140142 to Marples et al. ("the Marples application"). With respect to the claims as herein presented, this rejection is respectfully traversed.

As set forth at MPEP §2131, "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Accordingly, to maintain the §102(e) rejection of claims 1-15 the Marples application must disclose each and every element as recited in pending claims 1-15.

Claim 1

Independent claim 1 recites the following:

> 1. A system for traversing a network address translation/firewall device, having a public side and a private side, with network traffic, the network traffic passing between a device on the private side and a device on the public side; the system comprising:
> a network processing system on the public side of the network address translation/firewall device, the network processing system operable to anchor network traffic to and from the private side of the network address translation/firewall device; and
> a traversal client on the private side of the network address translation/firewall device having a secure connection with the network processing system, wherein the traversal client is operable to pass packets through the network address translation/firewall

device in order to create allocations in the network address
translation/firewall device to allow the network traffic to pass
between the private side device and the public side device, and
wherein the traversal client does not reside in the path of the traffic
between the private side device and the public side device.

With respect to claim 1, the Marples application at least fails to disclose "a traversal client on the private side of the network address translation/firewall device having a secure connection with the network processing system." In that regard, the Marples application simply does not disclose a traversal client or any other client on the private side of a network as required. Rather, the secure hub 200 of the Marples application is "a switching system that **resides on the public network** 112 outside any firewalls." Paragraph [0013] (emphasis added). Since the Marples application fails to disclose a traversal client on the private side of a network, the Marples application necessarily fails to disclose the additional limitations of the traversal client recited in claim 1. For example, the Marples application at least fails to disclose "wherein the traversal client is operable to pass packets through the network address translation/firewall device in order to create allocations in the network address translation/firewall device to allow the network traffic to pass between the private side device and the public side device." Further, the Marples application at least fails to disclose "wherein the traversal client does not reside in the path of the traffic between the private side device and the public side device." In that regard, the Marples application simply fails to disclose a traversal client that does not reside in the path between the private side and the public side as required. Rather, the secure hub 200 of the Marples application is necessarily in the path between the private side and public side. As described in paragraph [0015] of the Marples application, "[c]ommunications ... will be routed to the secure hub, which will then ... route/tunnel the communications (228) over the pipe and through the firewall to the private device."

Accordingly, for at least these reasons the Marples application fails to disclose all of the recited elements of independent claim 1. Claims 2-7 depend from and further limit independent claim 1. Therefore, Applicants request that the §102 rejection of claims 1-7 over the Marples application be withdrawn.

Claim 8

Independent claim 8 recites the following:

8. A method for traversing a network address translation/firewall device, having a public side and a private side, with bidirectional network traffic, the bidirectional network traffic passing between a device on the private side and a device on the public side; the system comprising:

receiving packets at a network processing system, the network processing system on the public side of the network address translation/firewall device;

passing control information bound for the private side device through a traversal client, the traversal client having a secure connection with the network processing system;

creating allocations in the network address translation/firewall device to allow the bidirectional network traffic through the network address translation/firewall device, the allocations created by sending a test packet from the traversal client to the network processing system through the network address translation/firewall device, wherein the traversal client does not reside in the path of the traffic between the private side device and the public side device.

With respect to independent claim 8, the Marples application at least fails to disclose "passing control information bound for the private side device through a traversal client, the traversal client having a secure connection with the network processing system." The Marples application simply fails to disclose a traversal client having a secure connection with a network processing system to pass control information through. Accordingly, the Marples application necessarily fails to disclose the additional limitations requiring use of the traversal client. For example, the Marples application fails to disclose "creating allocations in the network address translation/firewall device to allow the bidirectional network traffic through the network address translation/firewall device, the allocations created by sending a test packet from the traversal client to the network processing system through the network address translation/firewall device." Further, the Marples application fails to disclose "wherein the traversal client does not reside in the path of the traffic between the private side device and the public side device." As noted above with respect to claim 1, the Marples application simply fails to disclose a traversal client that does not reside in the path between the private side and the public side.

Accordingly, for at least these reasons the Marples application fails to disclose all of the recited elements of independent claim 8. Claims 9-15 depend from and further limit independent
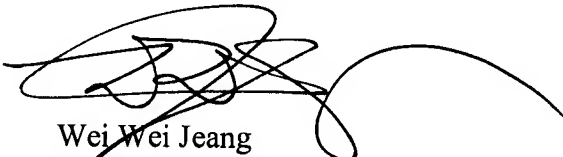
claim 8. Therefore, Applicants request that the §102(e) rejection of claims 8-15 over the Marples application be withdrawn.

V. Conclusion

It is clear from the foregoing that all matters set forth in the Office Action have been addressed and that claims 1-15 are in condition for allowance. An early formal notice of allowance of claims 1-15 is respectfully requested.

The Commissioner is hereby authorized to charge Haynes and Boone, LLP's Deposit Account No. 08-1394. in the amount of $230 for a two-month extension of time for consideration of the present paper. If any other fees are necessary, the Commissioner is hereby authorized to charge those to Haynes and Boone, LLP' s Deposit Account.

Respectfully submitted,

Wei Wei Jeang
Reg. No. 33,305

Dated: December 19, 2007

HAYNES AND BOONE, LLP
Customer No. 27683
Telephone: 972-739-8631

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Certificate of Service

I hereby certify that this correspondence is being filed with the U.S. Patent and Trademark Office via EFS-Web on December 19, 2007.

Linda Ingram